

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RANDY W. GILLERT,

Plaintiff,

v.

Case No. 1:08-cv-0567

Judge Virginia Kendall

**EXPERIAN INFORMATION
SOLUTIONS, INC., and US
DEPARTMENT OF EDUCATION**

Defendants.

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

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*Attorneys for Defendant
Experian Information Solutions, Inc.*

Defendant Experian Information Solutions, Inc. (“Experian”), with the agreement of Plaintiff Randy W. Gillert and Defendant United States Department of Education (“D.O.E.”) and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, moves the Court to enter the Stipulated Protective Order, which is attached as Exhibit A. In support of its Motion, Experian states as follows:

1. Documents and information have been and may be sought, produced, or exhibited by and among Experian, D.O.E. and Plaintiff relating to trade secrets, confidential research, development, technology or other confidential or proprietary information belong to Experian or D.O.E. and/or personal and confidential information of Plaintiff.

2. After consultation, Experian, D.O.E. and Plaintiff have agreed to the entry of the attached Stipulated Protective Order. The parties also have agreed on the form and content of the Stipulated Protective Order.

WHEREFORE, Experian requests that the Court enter the attached Stipulated Protective Order.

Dated: April 25, 2008

Respectfully submitted,

/s/ Gabriel H. Scannapieco

Gabriel H. Scannapieco

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EXPERIAN INFORMATION
SOLUTIONS, INC.

CERTIFICATE OF CONFERRAL IN GOOD FAITH

The undersigned hereby certifies pursuant to Federal Rule of Civil Procedure 26(c) that, as counsel for Defendant Experian information Solutions, Inc., he in good faith conferred with Larry P. Smith, counsel for Plaintiff, and Gina E. Brock, counsel for the United States Department of Education, via electronic mail regarding the need for and propriety of a protective order regarding certain confidential documents in this case. Plaintiff's counsel agreed to the entry of the Stipulated Protective Order attached hereto as Exhibit A.

/s/ Gabriel H. Scannapieco
Gabriel H. Scannapieco
Attorney for Defendant
Experian Information Solutions, Inc.

CERTIFICATE OF SERVICE

I, Paula S. Quist, certify that on the 25th day of April, 2008, I served the foregoing **AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following at their e-mail addresses on file with the Court:

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/s/ Gabriel H. Scannapieco
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